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To: [Aquind Interconnector](#)
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Subject: EN020022 Aquind Interconnector - Deadline 2 submission from Hampshire County Council (Reference: 20025080)
Date: 20 October 2020 14:30:54
Attachments: [EN020022_AQUIND_schedule_of_HCC_further_comments_on_ExQ1_D2.pdf](#)

Dear Sirs

Hampshire County Council notes that there has been a significant number of additional documents submitted by the Applicant and other interested parties at Deadline 1. Whilst the Council has had the opportunity to begin to digest some of this additional information, the timescales and availability of documents on the website have inevitably prevented officers from being in a position to review, and potentially comment, on all relevant material.

Nevertheless, set out in the attached schedule is the Council's further comments on the Applicant's responses to ExAQ1. The Council hope that this helps to assist the Examining Authority in further focussing on matters that are of particular note as the examination continues. In summary the response focusses principally on matters relating to the highways and public rights of way.

There are inevitably associated documents cross-referenced in the Applicant's responses which officers have yet to look through in detail. As such, the Statement of Common Ground has not been formally progressed since Deadline 1. Officers continue to meet regularly with the Applicant to discuss matters arising and anticipate being in a position to provide an updated Statement of Common Ground by Deadline 3. At Deadline 3, it is also anticipated that the Council will provide detailed comments on the updated dCDO, including the protective provisions submitted by the Applicant relating to the proposed controls of the highway network.

The Council is still considering its position with regard the Applicant seeking CPO powers over public highway subsoil in the DCO and whether such powers can properly be said to be required. The County Council would therefore alert the Examining Authority that it continues to reserve its position on this issue at this current deadline.

The Council also note the Applicant's submissions at Deadline 1 in relation to the proposed fibre optic cables (REP1-127). This includes a reference to Aquind having obtained Coded Powers relating to Telecommunications operations (Annex 1 Table 5 (iv) (h)). The Council understands that this cable will provide for running 'branches' off the main route to serve customers. At present, Hampshire has some potential concerns that the authorisation of the fibre optic cable under DCO could confer rights on the Applicant to undertake further activities on the highway without appropriate controls

Yours sincerely

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Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
1. Miscellaneous and General					
MG1.1 .17	The Applicant	<p>The Outline Landscape and Biodiversity Strategy [APP-506] summarises impacts on existing vegetation features through all phases of the Proposed Development and suggests mitigation, mostly through replacement planting for affected features. However, the replanting and management prescriptions in part 1.6 of the Plan appear to be restricted to sections 1 (Converter Station) and 10 (Optical Regeneration Station and landfall). Could the Applicant identify where the landscape management plans and outline</p>		<p>Landscape mitigation and management prescriptions have only been prepared for sections 1 (Lovedean - Converter Station Area) and 10 (Eastney-Landfall). For the Onshore Cable Corridor, the flexibility required for design and construction means the necessary mitigation cannot be designed until the final alignment and construction areas have been determined and actual impacts are confirmed. Reference is made in the updated Outline Landscape and Biodiversity Strategy (g) to the mitigation measures associated with the Onshore Cable Corridor in Section 1.5. Paragraph 15.4.7.2 bullet point 6 of the Landscape</p>	<p>Hampshire County Council's (HCC) position, as set out in its Local Impact Report (LIR), is that any compensation for tree loss or damage should be provided commensurate with the CAVAT value of the tree.</p>

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		<p>management prescriptions for affected features along the cable route in sections 2 to 9 are set out.</p>		<p>and Visual Impact Assessment (LVIA) (APP-130) states "[A]ll planting lost will be replaced with like for like species where practicable and in agreement with the relevant discharging authority." The wording in the updated Landscape and Biodiversity Strategy has been revised in paragraph 5.1.3 and 5.3.2 to replicate this statement for mitigation measures associated with the Onshore Cable Route and to add that trees should be positioned at least 5 m away from the cable route and more specifically the cable trench within the Order Limits. Draft DCO (APP-019) Requirement 7 (provision of landscaping) has been updated so as to require a detailed landscaping scheme in</p>	

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				relation to each phase of the Onshore Cable Route.	
3. Compulsory Acquisition					
CA1.3.5	The Applicant	The Statement of Reasons [APP-022] states there would be direct acquisition of subsoil beneath the highway without negotiation and without compensation. Is there sufficient legal justification for not negotiating or contacting landowners whose rights extend to the subsoil beneath the highway? Is there precedent for this?	Where HCC are the Highway Authority, but not the subsoil owner, the surface of the highway vests in the Highway Authority as a statutory freehold by virtue of s.263 of the Highways Act 1980 (and including any drains beneath the surface s.264). There is no precise definition for the depth of this freehold, the case law provides that it will extend down to the 'top two spits' (or spade depths) or as far down as is necessary for the construction or maintenance of the highway. So if HCC are divested of the sub-soil ownership, this slightly elastic ownership will remain with HCC as the highway authority and	Please refer to the 'Statement in Relation to Highway Subsoil Acquisition' (document reference 7.7.2) for the response to this question.	HCC is currently reviewing the document submitted by the applicant (ref 7.7.2) and the associated case law and DCOs referenced.

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			<p>statutory freeholder of the surface.</p> <p>HCC's powers of improvement apply over the highway surface, so if it needed to widen carriageways or install new highway infrastructure, it does not need a sub-soil legal interest to undertake this work.</p> <p>Where a highway is stopped up the subsoil, landownership will revive, where the subsoil is owned by HCC. There has been no agreement with respect to the Applicant's proposition to acquire land or rights in the subsoil. Consequently, HCC objects to the compulsory acquisition of land in its ownership.</p>		

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CA1.3.41	The Applicant Statutory Undertakers	<p>Has any contact been made with the following Statutory Undertakers to consult over and agree protective provisions? (Appendix B of the Statement of Reasons [APP-022] refers.)</p> <p>If so, what are the current positions of the Applicant and each of the following.</p> <p>If not, why not?</p> <p>If agreement has not been reached on protective provisions, what is the envisaged timescale for such an agreement?</p> <p>i) ESP Utilities Group Ltd.</p> <p>ii) GTC Infrastructure Ltd (GTC Electricity).</p>	<p>The Applicant contacted the County Council in July 2020 in relation to draft protective provisions as a consequence of the proposed disapplication of the Hampshire Highways Permitting Scheme. The County Council has undertaken an initial review of these proposed provisions, but the County Council remains of the view that the Permit Scheme should be applied and therefore that these matters should be addressed under that scheme rather than through bespoke protective provisions. The County Council provided the Applicant with a draft version of its Local Impact Report which sets out its position in relation to the Permit Scheme. We expect discussions with the</p>	<p>Yes, the Applicant has made contact and held initial meetings with all the Statutory Undertakers listed in question CA1.3.41 in order to consult with and agree protective provisions. The Applicant will work to secure the protective provisions before the end of the Examination.</p>	<p>HCC will seek to provide its observations for Deadline 3.</p>

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		iii) GTC Infrastructure Ltd (GTC Gas). iv) Hampshire County Council. v) National Grid Electricity Transmission plc. vi) Portsmouth City Council. vii) Southern Water Services Ltd – Sewers. viii) SSE PLC (Gas).	applicant to continue on this matter over the coming weeks. The applicant has not discussed any other proposed protective provisions with HCC in its other roles e.g. as Highway Authority on S.278, S.171 and Traffic Regulation Orders.		
CA1.3.42	The Applicant Environment Agency	What are the current positions of the Applicant and the Environment Agency in terms of its rights relating to watercourses? (Appendix B to the Statement of Reasons [APP-022] refers.)	HCC, in its role as Lead Local Flood Authority, will require an application for Ordinary Watercourse Consent in relation to the proposed works. Further details of this process, including fees, are set out at: https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/c hangewatercourse	Permits have not been applied for as part of the consent process and will be required prior to works under, over or adjacent to the watercourses for which the principles for construction have been agreed with the EA as secured within the Onshore Outline Construction Environmental Management Plan (APP-505) and will be included	As noted previously, HCC as Lead Local Flood Authority will also require an application for Ordinary Watercourse Consent.

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				within the Statement of Common Ground with the EA (document reference 7.5.14), to be submitted at Deadline 1.	
CA1.3.65	The Applicant	For the other consents, licences and permits required for the Proposed Development (Table 2-1 of the Other Consents and Licences report [APP-106]), what is the Applicant's view on the likelihood of each of them being obtained, including evidenced reference to any discussions with the relevant body concerned (in addition to the details already provided)?		As per the updated Other Consents and Licences document submitted at Deadline 1 (APP-106 Rev002), it is not anticipated that there will be any impediment to the grant of any other consent or licence identified to be required. In some instances, discussions remain ongoing, for example with Highways England, and this will be reflected in the Statements of Common Ground submitted at Deadline 1 alongside these responses. The other consents and licences identified for marine aspects (APP-106; Nos. 15-18 in Table 2-1) have	HCC has yet to reach a position where it is satisfied that the additional highway approvals typically otherwise required for such development (e.g. S278 / OWC / S171/S184) are capable of being suitably replicated within the DCO itself.

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				<p>been discussed with the relevant bodies who have expressed that they are content with the approach being taken and do not expect any impediments to the consents being obtained. Evidence of this can be found in the SoCGs with Natural England and JNCC and the MMO (document references 7.5.12 and 7.5.16 respectively)</p>	
CA1.3.105	Winchester City Council	<p>For the alternative cable routes shown in the application at Anmore Road (Paragraph 5.3.5 of the Statement of Reasons [APP-022]), which route would the Council prefer to see utilised, or have the least objection to, and why?</p>	<p>It is understood that the preferred option of Winchester City Council is to use the straight crossing for both cable circuits, as an extension of the route through King's Pond Meadow. The Highway Authority would support this in reducing the length of cable route within the highway and to minimise the length of cable within the highway.</p>		<p>The Applicant has confirmed an amendment to this route which addresses many of the Highway Authority's previous concerns on this matter. Confirmation of the proposed construction methodology within the revised order limits would be welcomed.</p>

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			<p>It is not clear why horizontal drilling is not being utilised to cross Anmore Road given the proposed drilling through King's Pond Meadow. The Highway Authority would prefer methods and routes to be used which reduce the impact of road closures and therefore impact on residents and users of the Highway.</p>		
CA1.3.107	Winchester City Council	<p>For the alternative cable routes shown in the application at Anmore Road (Paragraph 5.3.5 of the Statement of Reasons [APP-022]), what are the Council's views on whether the regulation provided by dDCO [APP-019] Requirement 6(2), together with the addition of an article similar to Article 19(5)</p>	<p>The Highway Authority refers to its comments on CA1.3.105. Given that the examination has only just commenced, we would expect the Applicant to have further explored these options and identified a preferred route prior to the close of the Examination. In the event that this is shown not to be feasible, the Highway Authority would value the opportunity to offer advice</p>		<p>Please refer to the response set out under CA1.3.105</p>

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		<p>and a requirement similar to Schedule 1 Part 3 Requirement 12 at Appendix D of the Examining Authority's Recommendation Report for the Thanet Extension Offshore Wind Farm Nationally Significant Infrastructure Project</p> <p>https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010084/EN010084-003108-TEOW%20%E2%80%93%20Final%20Recommendation%20Report.pdf</p> <p>would provide sufficient clarity at an appropriate time in respect of the chosen cable route, notwithstanding any other concerns that the Council may have?</p>	<p>on suitable wording within the DCO.</p>		
5. Draft Development Consent Order					

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
DCO1.5.1	The Applicant	<p>Explain in greater detail the technical and environmental reasons why Hayling Island was discounted as an alternative landfall and cable route option for the Proposed Development when it appears to share largely similar natural constraints with the selected route to Eastney (paragraph 2.4.11.14 of ES Chapter 2, Consideration of Alternatives [APP-117]).</p> <p>With reference to paragraph 2.4.3.8 and Table 2.3 of ES Chapter 2 [APP-117], please explain in more detail how the decision to choose Eastney as the landfall was reached on the basis</p>	<p>HCC does have some reservations about Hayling Island as an alternative landing point for the AQUIND cable route, particularly if it were to impact on the A3023 rather than a non-highway focussed route. Hayling Island is restricted to one road on and off the island (the A3023) and any disruption or severance along this route would create significant traffic delays for motorists, emergency services and the wider community. Given the extremely sensitive nature of the A3023, all planned highway works on the A3023 is undertaken between October and March, maintaining a single lane of traffic at all times (as a minimum) and must be done at night. Any significant works would cause delays both on the</p>	<p>The Applicant has produced a Supplementary Alternatives Chapter (document reference 7.8.1.3) which forms part of the ES Addendum (document reference 7.8.1) submitted at Deadline 1. Further information on the reasons for discounting Hayling Island, including the ability to HDD between the two islands is included within Section 6 of the Supplementary Alternatives Chapter. Section 7 of the Supplementary Chapter provides additional detail on the selection of the Onshore Cable Corridor, which is relevant to the decision of whether to pursue a Landfall at Eastney or East Wittering. Those options associated with Hayling Island were not feasible from an</p>	<p>The Highway Authority has reviewed Section 6 of document 7.8.1.3 and notes that highway implications were not considered by the Applicant as part of the assessment of alternative landing points. This was due to Hayling Island being ruled out as a landing area due to environmental and deliverability constraints. The Highway Authority have therefore not considered the use of Hayling Island as part of the application process in any detail and have no further comments to make at this stage.</p>

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		<p>of a site visit. What factors made Eastney a more viable option than the other beaches studied?</p> <p>Were impacts on the human population and traffic flows part of the optioneering process, including the discounting of Hayling Island during the assessment of alternatives?</p> <p>If so, please provide evidence.</p> <p>In paragraph 2.4.11.14 of the ES [APP-117], a number of reasons for excluding the cable route option through Hayling Island are listed. Expand on each of these reasons giving comparative explanation as to why such factors were or</p>	<p>island and the mainland as traffic backs along the Hayling Bridge onto the A27 Langstone Junction, strategic road network and through Havant town centre. Additional assessment would be required to understand the impacts on the A3023, and surrounding road network within Havant, if an alternative route was chosen.</p>	<p>engineering perspective. They were also considered likely to result in adverse impacts to the surrounding sensitive and heavily designated environment and subsequently discounted.</p>	

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		<p>were not considered prohibitive.</p> <p>Was a comparison made between the ability to HDD between the two islands (Portsea and Hayling) and the mainland?</p> <p>If so, what was the comparative outcome.</p> <p>If not, why not?</p>			
DCO1.5.9	The Applicant Local planning authorities	<p>In Article 42 of the dDCO [APP-019], is the precision around TPOs sufficient? (TPO plans [APP-018] and Schedule 11 refer.)</p> <p>The Applicant seeks powers over any tree in the Order limits rather than providing a schedule (as per model provisions and as is usual in other recently made DCOs). Schedule 11 of the</p>	<p>As set out in HCC's Local Impact Report, there is concern about the applicant's approach to addressing the potential impact on highway trees. HCC has declared a 'state of climate emergency' (https://www.hants.gov.uk/landplanningandenvironment/environment/climatechange). Trees are an important asset of green infrastructure and mitigating climate change in this regard. Trees within</p>	<p>See response to DCO1.5.8 and Appendices: • Updated Tree Constraints Plans (document reference 7.4.1.10); and • Updated Tree Survey Schedule (document reference 7.4.1.10). This exercise has further refined the trees identified at risk and those to be retained.</p>	<p>A TPO does not give precedence to the importance of the Highway Asset. Analysis of the impact on trees within the order limits should be undertaken for all highway trees as set out within section 5.41 to 5.44 of HCC's LIR response. Further comments are also made in paragraphs 17-19 of Appendix 1 of the LIR in relation to</p>

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		<p>dDCO [APP-019] (TPO trees) only lists '<i>potential removal</i>' and '<i>indicative works to be carried out</i>'. How can this be specific enough to understand the impact of the Proposed Development on trees?</p> <p>If this remains unchanged, should the ExA in weighing the benefits and disbenefits of the Proposed Development therefore assume the loss all of the trees within the Order limits during construction and throughout the lifetime of the Proposed Development, given that 42(2)(b) of the dDCO [APP-018]</p>	<p>highway land are generally not subject of TPO as they are effectively managed and protected by the County Council itself. As such, the absence of a TPO should not be inferred to reflect a judgement made on the condition, quality or value of tree.</p> <p>The County Council has recently introduced a policy which requires compensation for the loss of highway trees, utilising the Capital Asset Value of Amenity Trees (CAVAT). Such an approach should be secured through this DCO. In addition, the County Council seeks clarification on the compensatory proposals in the draft DCO and wishes to ensure that the applicant will pay compensation for all loss of, or damage to trees.</p>		<p>the associated proposed controls within the dDCO.</p>

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		removes any duty to replace lost trees?			
DCO1.5.34	The Applicant	<p>In Articles 10 and 11 of the dDCO [APP-019], please explain what is meant by 'whether or not within the Order Limits'? Does this imply powers to the applicant extending beyond the extent of the Order limits?</p>		<p>Article 10 of the dDCO expressly states that the power applies outside of the Order limits. This is not a novel approach, with many made DCOs containing this wording, with it being necessary to ensure certainty of delivery and subject to appropriate controls.</p>	<p>HCC's LIR response seeks further clarity on how works outside of the order limits would be appropriately controlled within the DCO process.</p> <p>HCC's response reads "Article 10 (1) appears to provide powers to the Applicant for works both within and outside of the Order Limits. Clarification is sought as to how works outside of the Order Limits would be appropriately controlled through the DCO. Article 10 (3) is not entirely clear in its present drafting and should be reviewed. One suggestion would be to consider splitting the paragraph into two</p>

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					<p>sentences: the first to cover the powers not being exercised without the approval of the street authority, the second to cover how the powers would be approved."</p>
DCO1.5.35	<p>Portsmouth City Council Hampshire County Council</p>	<p>Across Articles 10, 11 and 13 (in particular) of the dDCO [APP-019], numerous provisions are made in respect of highway works. Are the Highway Authorities content with the scope and level of rights empowered to the applicant by the dDCO [APP-019]?</p> <p>Are these Articles (and the full scope of powers sought within them) necessary for the type of development proposed?</p>	<p>The Highway Authority are not content with the proposed arrangement within the DCO and are yet to see evidence to why alternative approaches are beneficial to the public. In the continued absence of such justification the Applicant is encouraged to sign up to the full S278, S171, TRO and permit scheme processes which are well established and provide the Highway Authority with the appropriate powers to protect the Highway asset and public interest. This preferred approach is set out within HCC's LIR</p>		<p>From a public rights of way perspective, it is noted that the matter has been partially addressed in the Applicant's Explanatory Document (DCO1.5.68) 7.4.1.6. However, HCC has yet to reach a position where it is satisfied that the additional highway approvals (e.g. S278) are capable of being suitably replicated within the DCO itself</p>

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			<p>response and comments on the dDCO within Appendix 1.</p> <p>Article 10 gives powers for permanent or temporary amendments to the street whether within the order limits or not. It is considered that changes permitted within the DCO should only apply to the order limits and separate processes would need to be followed to make any further amendments to the street outside of the order limits. The powers for amendments are also not relevant to the type of works being undertaken. The relevance of the powers set out within points A to I require review and only powers relevant to the works required should be included within the DCO. The Article refers to clause 24 relevant to the traffic management strategy and</p>		

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			<p>this should be we believe clause 19. Approval for changes to the street must be sought separately and cannot be considered approved through the traffic management strategy. Clause 19 refers to the information required to permit works on the highway under NRSWA requirements and not for assessments of the proposals in engineering terms. As set out in HCC's LIR response, this will require a separate approval process with a requirement for all details for the cable laying works to be submitted to the Highway Authority for appropriate engineering assessment and approval.</p> <p>Article 11 relates to permissions for street works and HCC have no comments on this drafting at this stage however should the permit scheme</p>		

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			<p>be adopted appropriate reference will need to be made.</p> <p>Article 13 is regarding the temporary stopping up of the street and public rights of way. It is unclear why temporary stopping up is required and the Highway Authority have requested clarity on this matter. It is considered that all works can be undertaken through temporary closures (either full or part) and therefore there is no benefit to stopping up of the street.</p>		
DCO1.5.43	The Applicant	A large proportion of the mitigation measures in the ES and the HRA Report [APP-491] that are needed to avoid adverse effects would not be secured directly through the draft DCO [APP-019]. Instead, reliance would be placed on the further		A review has been completed of all mitigation measures required for the Proposed Development as outlined in the ES and HRA. How all measures are secured will be outlined in the updated Mitigation Schedule to be submitted at Deadline 2. In addition, an updated	Appendix 5 Aquind Mitigation and Control Chart has been provided in response to this matter. The chart is beneficial but lacks the detail necessary for it to be a robust summary of what is required post planning and what principles have been

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		<p>development and securing through DCO Requirements (e.g. draft Requirements 12, 13, 14, 17 and 19) of final versions of a series of outline and framework management plans such as the Outline Landscape and Biodiversity Strategy [APP-506] and the Onshore and Marine Outline CEMPs ([APP-505] and [APP-488]). Could the Applicant review the proposals for such outline plans and frameworks, the dDCO, and corresponding detailed management plans and demonstrate that the ExA and Secretary of State can be confident that all necessary mitigation measures relied on in the EIA and HRA can</p>		<p>Onshore Outline CEMP (APP-505 Rev002) and Outline Landscape and Biodiversity Strategy (APP-506 Rev002) have been produced. The updated Mitigation Schedule will outline the mitigation required, which document secures the measure and under which Requirement of the dDCO. Cross References will also be added. A chart illustrating the Relationship of the Onshore Details Secured by Requirements has been attached to this document as Appendix 5 (document reference 7.4.1.5). This illustrates all the outline Plans that have been produced and where the Final Plans require approval in the future. Schedule 14 did not list the Marine Archaeology Outline Written Scheme of</p>	<p>agreed. It would also be beneficial if responsibility for approvals of the post planning matters is made clear, with specific regard to the Highway Authority involvement.</p>

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		<p>be properly secured through this mechanism and provide adequate certainty that adverse effects on the integrity of European sites would be avoided? Please identify how and where the outline documents ensure that the necessary measures would be included in the final versions, especially where the framework or strategy is brief and does not include a full 'contents' list for the detailed plan. In order to provide a clearer audit trail for the ExA, the Secretary of State and the authorities that would have the responsibility for approving the final versions of any such plans, does the Applicant believe it</p>		<p>Investigation (WSI) (APP-397) which is now included in the updated dDCO (APP-019 Rev002).</p>	

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		<p>would be useful to provide cross reference entries from the Mitigation Schedule [APP-489] to the specific relevant sections of the outline plans? Could the Applicant also provide some further clarity in relation to Schedule 14 of the dDCO [APP-019]. There appear to be more outline management plans mentioned in the Application documents than those listed in Schedule 14, so could the Applicant explain why not all are intended to be certified? In doing so, could the Applicant check the names of plans mentioned in the dDCO and elsewhere against the titles on their covers. Any differences may</p>			

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		<p>explain some of the lack of clarity. For example, are the following the same: • Soils and Materials Handling Plan, Outline Materials Management Plan (appended to CEMP [APP-505]) and Outline Soils Resources Plan (appended to CEMP [APP-505])? • Aquifer Contamination Mitigation Strategy (draft Requirement 12) and the Surface Water Drainage and Aquifer Contamination Mitigation Strategy [APP360]? Please check the list of outline plans and allied control documents set out in Schedule 14 of the dDCO and clarify if all of the documents that are mentioned in the ES and relied upon for</p>			

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		<p>mitigation, and are therefore require to be certified and subsequently approved in a final version, are listed If not, please update. If any are mentioned in the ES that do not require to be listed in Schedule 14, please explain why (for example, if they are appended to, or an inherent part of a broader document that is listed). Would any plans that are relied on in the EIA or HRA to secure mitigation not be secured through a dDCO Requirement? Please demonstrate how the written schemes set out in draft Requirements 13 and 14 are led by an outline or framework plan, and how and</p>			

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		<p>where these are secured. Explain the level of confidence that the ExA and host local authorities can have that secured measures would be capable of adequately mitigating the relevant matters. If necessary, provide outline documents listing measures that would be secured, drawings that would be prepared, and consultations that would be undertaken.</p>			
DCO1. 5.63	The Applicant	<p>The time period by which a discharging authority (for example in dDCO [APP-019] Articles 11(4) and 13(8)) must respond to approve submitted details is shorter than the time periods used in other DCOs relied upon as precedent.</p>		<p>Both refer to working days, rather than days, which explains why the number used is less. The Applicant considers the timescales to be appropriate and in line with other made DCO's.</p>	<p>It is noted that the local planning authorities have requested consistency within the approval times frames. In places 20 working days are referred and in other 40 working days. If the Highway Authority are to be</p>

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		Explain why this is the case.			consulted via the Local Planning Authority consideration must be given to the time frame for this consultation to take place, and the potential loss of time to the Highway Authority when waiting for said formal consultation from the Local Planning Authority. This should be considered within any agreement on approval timescales.
DCO1.5.65	The Applicant	The use of the phrase 'reasonable time' is ambiguous in Article 13(1) of the dDCO [APP-019]. Who would decide what is a reasonable time, and would not such a period be dictated by 'weekly' timetable set out in the Framework	This matter has been identified within HCC's LIR response, Appendix 1. The Highway Authority is seeking clarity on the definition of 'reasonable time'.	This wording is included in many made DCOs and is considered entirely appropriate. The period of time will be what is reasonable in the circumstances. Whilst the Framework Traffic Management Strategy and the detailed Traffic Management Strategies	It is still considered by the Highway Authority that the term 'reasonable time' needs to be clearly defined within the DCO as set out within Hampshire County Councils LIR response.

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
		Traffic Management Strategy?		will be of relevance to how long is reasonable, given those controls are otherwise provided for it is not necessary to complicate the Article by directly including reference to this.	
DCO1.5.66	The Applicant	The implication of Schedule 8 of the dDCO [APP-019] is that the listed streets would be temporarily stopped up, although in most cases only one half of the carriageway would be affected. Can some clarity be given as to what streets would be fully stopped up (temporarily) and thus a diversion put in place, and where one half of the carriageway would remain open for the duration of the works?	As detailed in its LIR, HCC seeks clarity over the use of the term 'stopping up' and whether this refers to single lane or road closures rather than the formal process of stopping up under the Highways Act 1980 Section 247 and the County Planning Act 1990 Section 116.	The highways (footways and roadways), footpaths and permissive paths listed in Schedule 8 to the dDCO (APP-019 Rev 002) are those that are to be temporarily stopped up (i.e. the full width of the way will be restricted at a single time). The placing of traffic management in the highway which would prevent traffic from passing along, for example, a lane of a carriageway does not constitute stopping up, as the relevant way is still (in part) able to be used by traffic to which it is subject. In such	From a public rights of way perspective it is understood that no alternative route is proposed during temporary closure of Footpath 4 (Horndean) and Footpath 16 (Denmead). Temporary Traffic Regulation Order closure is proposed by HCC as opposed to Stopping Up. Please see link to Countryside Service Temporary Closure procedure in DCO1.5.67 https://www.hants.gov.uk/landplanningand

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>circumstances the provision of traffic management on the highway will be authorised pursuant to Article 16 (Traffic regulation measures), with the details of the traffic management measures to be confirmed via the submission of traffic management strategies to the relevant highway authority in accordance with paragraph 4 of Part 5 of Schedule 13 to the dDCO. Further information regarding the temporary stopping up of public rights of way proposed to be authorised and the diversions to be provided in connection with them is provided within an explanatory note relating to diversions of the public rights of way located at Appendix 14 to the ES</p>	<p><u>nvironment/rightsofway/temporaryclosures</u></p> <p>TSF/1/b/should be omitted in order that the whole footpath is closed to prevent users turning back. Highway closure between TSH/1/d and TSH/1/e appear to make it likely to require the temporary closure of Denmead Footpath 19 and Horndean Footpath 28.</p> <p>Positions of TSF/2/a and TSF/2/b should be amended to allow the TRO Temporary Closure of the whole length of the Right of Way. Havant Footpath 11, to the south of the Fire Station on Maurpas Way, appears potentially affected and is not referred to in the plans. Any obstruction of the</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				Addendum (document reference 7.8.1.14).	<p>cycleway by AC/4/a may require improvements to Havant Bridleway 15. Alternatively, the compound should be amended to avoid impacts to the cycle route.</p> <p>Havant Footpath 19 and Southwick and Widley Footpath 35 and its users should be protected and remain open throughout the development. Whilst HCC, as Highway Authority, still require clarity on the term 'stopping up' it is considered that this is unnecessary in order to carry out the works and Temporary TRO's would be sufficient and more appropriate to implement the works under traffic</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
					management arrangements.
DCO1.5.67	The Applicant	Notwithstanding the answer to DCO1.5.66, should dDCO [APP-019] Article 13(5) be amended to include reference to 13(4) as well as 13(1) so that adequate notice and consultation with the relevant street authority takes place?	HCC considers that Article 13 is unclear on the approval process for any temporary closures and what consultation with the relevant street authority includes. An appropriate approval process should be secured within the DCO.	The Applicant does not consider it necessary to amend Article 13(5) to refer to Article 13(4). The extent of the stopping up of those highways is known now and detailed in the dDCO at Schedule 8 and on the corresponding plans so as to authorise the temporary stopping up of those highways without the need to go through the additional process provided for at Article 13(5). Should any relevant street authority have any reasonable conditions that they wish to see imposed in relation to the temporary stopping up of public rights of way identified in Schedule 8 and shown on the corresponding plans,	<p>Please refer to the response set out under DCO1.5.66</p> <p>HCC Countryside Service requests that its Temporary Closure order process is followed, and applications are made at least 6 weeks in advance.</p> <p>https://www.hants.gov.uk/landplanningandenvironment/rightsofway/temporaryclosures</p>

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				they are able to raise these during the examination.	
DCO1.5.68	The Applicant	In respect of Article 14 of the dDCO [APP-019], provide a detailed description of the intentions at each of the access points shown in the Access and Rights of Way Plans (Sheets 1 to 10) [APP-011] stating the purpose, whether a new or altered access is being formed and by what arrangement, and, specifically in relation to AC/1/a, can a plan be provided detailing site specific remodelling and access formation.	HCC shares the ExA view that further plans showing the details of the proposed access points, and associated works, are required to inform a view on the acceptability of these arrangements.	<p>The Applicant has produced an Access and Rights of Way: Explanatory Document, included as Appendix 6 to this document (document reference 7.4.1.6). The Appendix provides further explanatory information regarding the following topics:</p> <ul style="list-style-type: none"> • The nature of the proposed access; and • The purpose of the proposed access. <p>Whether the proposed access is new or comprises of and an alteration of an existing access point.</p>	<p>The Explanatory Document is useful but raises some further questions and fails to take into account some rights of way and promoted routes as well as proposing closure of sections of path rather than routes from the nearest highway.</p> <p>See HCC's further comment on DCO1.5.66 above in relation to AC/1/a-d and TSH/1/b -d.</p> <p>The new Access and Rights of Way: Explanatory Document should include drawings of the proposed access arrangements to</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
					<p>ensure that they are acceptable to the Highway Authority in relation to location, form, visibility splays, tracking and that the gates are sufficiently set back to avoid vehicles obstructing the carriageway. This is in the interest of highway safety. Such details are sought at this time to ensure that the proposed accesses are acceptable and don't require amendments which may have implications to the cable laying works. It is also noted that the proposed accesses are onto the classified road network which require the details to be approved at planning. In addition, it is understood that there is concern from</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
					<p>the local planning authorities regarding hedgerow removal. The extent of this potential removal of hedgerows cannot be fully understood without appropriate drawings of the works. HCC Countryside Service would also wish to be consulted on the CEMP</p>
DCO1. 5.70	The Applicant	Should dDCO [APP-019] Requirement 10 reference the Access and Rights of Way Plans [APP-011]?		<p>This is not necessary as the power to provide an access is contained at Article 14, which does refer to those plans as necessary. The Requirement is a control, not a power, and is therefore subordinate to Article 14.</p>	<p>It is considered that insufficient detail has been provided within the plans to allow approval within the application for works to be undertaken at the proposed locations. It is unclear what access requirements are at the shown locations or whether safe access can be achieved. Drawings of the proposed access locations will need to</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
					<p>be provided along with details of recorded speeds and expected junction movements, both in quantity and with regards vehicle type, before the current wording in the DCO would be agreeable. This matter has been raised within HCC's LIR response.</p>
DCO1. 5.73	The Applicant	<p>How does dDCO [APP-019] Requirement 18(1) relate operationally to Requirement 18(3)? Where should authorities look to ascertain the hours of working permitted bearing in mind the outline CEMP is prepared without reference to phases?</p>		<p>Requirement 18(1) provides the standard position, whereas 18(3) provides for deviations from this. The authorities should refer to Section 2.3.1 of the Onshore Outline Construction Environmental Management Plan ('CEMP') (APP-505), which sets out the works forming part of the Proposed Development in relation to which hours may be different from the standard position stated</p>	<p>How working hours are to be agreed with regards the works within the highway are determined by the CEMP and the CTMP's for each phase. These elements will need to either be agreed through the permit scheme or appropriate additional provisions within the DCO.</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>at Requirement 18(1). The Onshore Outline CEMP covers the whole of the onshore element of the Proposed Development and the works within a phase forming part of the Proposed Development will be required to comply with the information stated in relation to them in the Onshore Outline CEMP. The drafting of the Requirement and the supporting control document are considered to be adequate and appropriate to explain the position and to sufficiently control the carrying out of the Proposed Development.</p>	
DCO1.5.80	The Applicant	<p>dDCO [APP-019] Article 10 relates to a very specific list of works, rather than conveying a general power to be an</p>		<p>All of the activities provided for in Article 10(1)(a) of the dDCO</p>	<p>Article 10 relates to the approval mechanism for works to the highway. The clauses and drafting within this section are</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
		<p>undertaker working in the highway. Please amend this to ensure only engineering works applicable and appropriate to the actual works intended are covered.</p>		<p>(APP-019) are considered to be necessary in connection with the carrying out and maintenance of the Proposed Development. The extent to which any such activities are carried out in reliance on those powers will be determined by the detailed approvals required to be obtained in relation to the relevant works. When considering the Article in context of the Order as whole, the drafting is considered to be entirely appropriate and no works listed should be removed. It is also noted that Article 10(1) is a general power. See drafting "without limiting the scope of this paragraph".</p>	<p>not supported by the Highway Authority. The Highway Authority's position is that the Applicant should agree to the Hampshire Permit Scheme and S278 design check process for the works. This would allow the Highway Authority to review the relevant detail, provide relevant protections and controls as necessary for the type of works and enable the works itself to benefit from the flexibility and agility provided through these processes. The Highway Authority has yet to be presented with information which demonstrates a compelling benefit to the public, Highway Authority or indeed the</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
					<p>Applicant in discounting these established processes. Once the approach for approvals is agreed, the clauses in Article 10 will need to be reviewed further to ensure appropriate measures are secured.</p>
DCO1. 5.82	The Applicant	<p>dDCO [APP-019] Articles 41 and 42 both use the phrase 'it reasonably believes it to be necessary.' Can the applicant elaborate on the process for fair and impartial assessment of whether an action to lop or fell a tree is 'reasonable', 'necessary' and based on technical expertise, to reassure the ExA that such works would not be carried out following an arbitrary judgment.</p>		<p>The Applicant will seek to avoid all impacts on trees where possible as identified within paragraph 6.3.2.1 of the Onshore Outline CEMP (APP-505 Rev002) and requirement 15 of the dDCO (APP-019). Where this is not possible, all pruning and felling works will be specified by a suitably trained and experienced Arboriculture consult and will be carried out by a suitably trained and experienced arboriculture contractor, in accordance with the</p>	<p>The term "unavoidable" in lieu of "it reasonably believes it to be necessary" should be utilised as a means of identifying where it is necessary to remove a tree.</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>updated OLBS (APP-506 Rev002) at Section 1.3.4, secured by requirement 15 of the dDCO. The Applicant can confirm that for the purposes of the Proposed Development "lopping" is taken to be any pruning requirement to the tree but excludes felling. Pruning will only be prescribed in accordance with British Standard 3998: 2010 "Tree Works – Recommendations" and industry best practice. Pruning works will only be prescribed where there is a statutory obligation to do so (such as vegetation impeding a vision splay at a road junction) or where not to prune would be to the detriment of the tree (a typical example of this would be to carry out minor pruning to allow root protection measures to be installed).</p>	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
DCO1.5.83	The Applicant	dDCO [APP-019] Article 42 (2)(b) disappplies the duty to replace trees (in the case of TPO trees), with Articles 41 and 42 only seeking to pay compensation to the tree owners in each individual case. Why is the Applicant not seeking a landscape restoration programme whereby trees removed are replaced in commensurate scale, kind or location?		The updated OBLs (APP-506 Rev002) requires that all trees will be replaced if lost in accordance with the Arboriculture Report (APP- 411) and paragraph 1.4.4.10 of the OLBS, regardless of TPO designation.	Any compensation for tree loss or damage should be provided commensurate with the CAVAT value of the tree.
15. Socio-Economic Effects					
SE1.1 5.21	The Applicant	Amongst the assumptions explicitly included in the LVIA set out in the ES [APP-130] is that all public rights of way affected by the Proposed Development would be reinstated to the same		[APP-130] is that all public rights of way affected by the Proposed Development would be reinstated to the same condition and quality as previously. Can the Applicant explain how effective reinstatement of	A condition assessment should be carried out prior to commencement of works and submitted to the Highway Authority. A chargeable inspection of the public right of

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
		<p>condition and quality as previously. Can the Applicant explain how effective reinstatement of affected public rights of way has been secured in the dDCO?</p> <p>What would be the timescale for reinstatement?</p> <p>How would it be determined that the affected public rights of way had been reinstated to the same condition and quality for users as was present prior to construction?</p> <p>Has the Applicant given any consideration to enhancement?</p>		<p>affected public rights of way has been secured in the dDCO? What would be the timescale for reinstatement? How would it be determined that the affected public rights of way had been reinstated to the same condition and quality for users as was present prior to construction? Has the Applicant given any consideration to enhancement?</p> <p>Reinstatement of affected public rights of way is secured by Requirement 22 of the dDCO (APP-019) The timescale for the physical reinstatement or an affected Public Right of Way is typically one working day. As part of any diversion the Applicant will be required to first consult with the relevant street authority, who may attach</p>	<p>way by HCC Countryside Services will also be required to ensure suitable reinstatement. HCC Countryside Service seek the right to charge for inspection.</p> <p>Design details of vehicular crossings should therefore be agreed with the Highway Authority. PROW routes should be reinstated to equivalent or better standard.</p> <p>Improvement to the Clarity is sought in the reference to Relevant Street Authority. Portsmouth City Council are the Highway Authority in respect of public rights of way in Portsmouth. Otherwise the Highway Authority is Hampshire Countryside Service.</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>reasonable conditions to any consent, including in relation to reinstatement. This is secured by Article 13 of the dDCO (APP-019). The Applicant does not consider enhancement to be necessary/justified given the limited nature of impacts, resulting from crossing public rights of way.</p>	<p>PRoW network most affected in Lovedean and Horndean and Eastney should be considered in line with NPPF paragraph 98.</p> <p>Right of Way remediation works should be to HCC Countryside Design Standards unless otherwise agreed.</p> <p>Links to standards: https://www.hants.gov.uk/landplanningandenvironment/countryside/designstandards and https://documents.hants.gov.uk/countryside/designstandards-pathsurfacing.pdf</p>
16. Traffic and Transport					

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
TT1.1 6.11	The Applicant	<p>Paragraph 22.4.7.15 of Chapter 22 of the ES [APP-137] states that a number of potential joint bay locations have been included within the Order limits, but the final number would be determined by the contractor. Please could you explain the assumptions that have been applied in relation to the joint bay locations and the consequential impacts.</p> <p>Please clarify the meaning in this paragraph of the phrase <i>'these are considered to result in the same predicted impact and significance of effect as the proposed traffic management requirements.'</i></p>		<p>The assumptions that have been made in relation to the location of Joint Bays are as follows, and as are included in the Onshore Outline CEMP (APP-505):</p> <ul style="list-style-type: none"> • Typical cable lengths of 1000 m – 1200 m, limited by the size of the drums, not the production process. A length of 1500m will be required for the HDD crossing of Langstone Harbour. • The amount of material excavated from a Joint Bay is approximately (15m x 3m x 1.7m =) 76.5m³. This can be managed within the corridor in the space allocated for cable drums and stands or cable winches • Joint Bays are to be located off carriageway, 	<p>The response and general methodology used to determine the location of the Joint Bays in the applicant's response is noted. However, HCC still has concerns with the lack of detail provided regarding the location of the joint bays which could have significant implications on future highway schemes based on their positioning.</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>where practicable, to mitigate disruption to traffic. An exception is likely to be in the A3/London Road, where joint bays will be in the bus lane.</p> <ul style="list-style-type: none"> • There must be space for a joining compound, typically 20 m x 6 m, for workshops, welfare, storage, security and parking. • There should be good access to the Joint Bays for cable drum deliveries, and space at the ends of the Joint Bays for cable drums and delivery vehicles or drum stands and for cable winches and anchors. • Cable section lengths may also be dictated by the cable route. Where practicable any significant bends should be at the start of the pull, to mitigate pulling tension 	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>and side loadings on the cables during installation. Where there are a number of significant bends then shorter cable sections are appropriate.</p> <p>Paragraph 22.4.7.15 of ES Chapter 22 (APP-137) states that "within the Order Limits a number of potential Joint Bay locations have been included, all of which provide adequate space for construction works to take place without blocking the carriageway (including vehicle delivery / parking). The exact number and location of the Joint Bays however will be determined by the contractor, and for this assessment, with this Chapter, these are considered to result in the same predicted impact and significance of effect as the proposed</p>	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>traffic management requirements.”</p> <p>In answer to the second part of the question, all of the potential Joint Bay locations have been selected on the basis that construction could be facilitated by similar or less disruptive traffic management when compared to installation of the ducting for the Onshore Cable Route. For example, where Joint Bays are constructed on A3 London Road, this could be facilitated through a single lane closure rather than requiring shuttle working traffic signals or a full road closure. Construction of Joint Bays will also be completed using the same construction working hours and will generate a</p>	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>similar number of construction traffic movements as installation of the cable ducts for the Onshore Cable Route. Therefore, construction of Joint Bays results in predicted impacts no worse than those assessed within ES Chapter 22, and therefore is considered to be comparable with the traffic management required to facilitate the construction of the Onshore Cable Route. Further to this, Section 3 of the Supplementary Transport Assessment (document reference 7.8.1.11) and Section 15 of the ES Addendum (document reference 7.8.1) include an assessment of abnormal load HGV movements associated with delivery of cable drums to required Joint Bay</p>	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				locations. This assessment has concluded that these HGV movements do not result in any significant effects in relation to construction of the Joint Bays.	
TT1.1 6.13	The Applicant	Paragraph 22.6.5.19 of Chapter 22 of the ES [APP-137] and the CTMP [APP-450] detail that pruning and tree works would need to take place along the routes of access for abnormal loads. What process would be used in relation to the necessary consents and any compensation, given that the powers under the Order would be limited to the Order limits?		[APP-450] detail that pruning and tree works would need to take place Pruning outside of the Order Limits to allow abnormal loads shall be designed to comply with the Highways Act 1980 section 154 requirements. This is a statutory obligation for the person who owns / is responsible for the trees to prune tree to remove an obstruction to the safe use of the highway. Should the abnormal loads require additional clearance, this shall be targeted pruning at specific points to be agreed with the haulier,	This approach is deemed reasonable with respect the highway elements and should be secured appropriately within the DCO.

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>landowner, project team and where appropriate, the local planning authority prior to the works being carried out. All tree works are to be carried out in accordance with British Standard 3998:2010 "Tree Work - Recommendations", as is confirmed at paragraph 5.1.5 to the Outline Landscape and Biodiversity Strategy (document reference 6.10)</p>	
TT1.1.6.14	Applicant	<p>The Framework Transport Management Strategy [APP-449] contains several instances where works are for 'between x and x weeks' depending on the chosen construction options. Some of these range from 1 day to 9 weeks. Can the</p>		<p>The desktop study of the highway system sought to create a quantitative evidence base in order to set the baseline for the wider study area. This was undertaken using a two-stage approach. The approach first used professional knowledge of the Applicant's transportation consultants, who have</p>	<p>HCC notes that the duration for works areas have been amended to reflect the variance that may be experienced due to limitation on working hours. Comments on the FTMS have been set out within its LIR. HCC seeks further revisions to be made in</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
		<p>Applicant explain the approach that the chosen contractor would be expected to take in formulating an approach, and if the works with the shortest duration and most limited environmental effects would be selected? In the event that multiple contractors were to be used in the construction of the Proposed Development, what measures would be put in place to ensure that their work is co-ordinated in line with the Framework Traffic Management Strategy [APP-449] and the Framework Construction Traffic Management Plan [APP-450]? How would this be secured in the dDCO?</p>		<p>completed several projects in the Portsmouth / South Hampshire region. This professional local knowledge was used to gain an initial understanding of key junctions, links, corridors and receptors which were likely to be impacted by the proposals. This was subsequently expanded upon through analysis of data sources which we subsequently included in the desktop study and used to inform the baseline for both the Onshore Cable Corridor and the wider study area. The data sources consulted in the desktop study are: • Extensive reviews of existing conditions, through the use of site inspections, web-sources such as Google maps and Google Earth to determine the</p>	<p>accordance with these comments.</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>nature of the receiving environment and determine sensitivity, including factors such as proximity of residential properties to the carriageway, locations of schools, care homes, bus stops, pedestrian crossings; • Ordnance Survey data was reviewed and used for the measurements of carriageway, footway, island widths; • Local public transport schedules and route maps were reviewed and consultation with public transport operators undertaken; • Local walking and cycling and Public Rights of Way plans; • Highways England data diversion routing plans; • Assessment of Personal Injury Accident data obtained from local police; • Highway</p>	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>boundary information from Local Authorities; and • Tree surveys which were used to inform any proposals made. The desktop study was also supplemented by several site visits to both the Onshore Cable Corridor and the wider study area undertaken through the course of 2018 and 2019, together with an extensive suite of traffic count surveys outputs. Traffic surveys completed included over 30 Automated Traffic Counts, 10 Manual Classified Turning Counts, as well as various Parking Surveys. The locations of the completed surveys can be seen in ES Chapter 22, Figure 22.2, Traffic Survey Locations (APP317). Further information regarding how the collated data was used to determine the</p>	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>baseline sensitivity of highway links is set out in Section 22.4.9. of Chapter 22. The second element of the desktop study was based upon a review of the of the outputs of the Solent Sub Regional Transport Model (SRTM) modelling which was undertaken to inform this work which is included within the Transport Assessment (APP-448) and the Supplementary Transport Assessment (document reference 7.8.1.11). The results of the SRTM were reviewed to assess the extent of worst-case of traffic redistribution that could take place as a result of the proposed development, and thus inform the extent of the study area required. In line with the guidance set out in the Guidelines for the Environmental</p>	

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>Assessment of Road Traffic, links were included in the study area is they incurred a change in traffic flow (or HGV flow) of over 30%, or 10% in the case of links which contain sensitive receptors. Further information regarding the selection criteria can be found in Section 22.4.4 of Chapter 22. Throughout all stages of the preparation of the Application, the Applicant held discussions with the Local Highway Authorities to further inform the results of the desktop study.</p>	
TT1.6.19		<p>It is not clear from [AS-016] what consultation has taken place with the relevant bus operators in coming to conclusions on providing temporary bus stops</p>		<p>A meeting was held with First Group (First Hampshire & Dorset) on the 22nd August 2019 to discuss the Proposed Development and the potential impact to local bus services in the</p>	<p>HCC are seeking engagement directly with the bus service operators to ensure a cohesive response. HCC have invested heavily in bus infrastructure to</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
		<p>and diverted services. Explain what consultation has taken place and what the outcomes of this consultation were.</p>		<p>Portsmouth and South Hampshire area. At this meeting, discussions were held regarding the potential for First Group to provide a shuttle bus service along Moorings Way / Locksway Road and Milton Road should the closure of Furze Lane be required to facilitate construction of the Onshore Cable Route. Since this meeting was held, the Order Limits have been further refined, with the entirety of Furze Lane and the associated Bus Link being removed. Following this Order Limit update, the need to provide a shuttle bus service has also been removed, as bus movements along Furze Lane will no longer be impacted by the proposed construction works. At pre-submission an attempt was also made to</p>	<p>support bus service provision along the A3 corridor and, as set out in its LIR, seeks support from the applicant for mitigating adverse impacts to service provision during the construction period. HCC will respond further on the bus journey time assessment in due course.</p>

Reference	Respondent(s)	Question	HCC Response 6 Oct	Aquind Response 6 Oct	HCC further comment (20 October 2020)
				<p>consult with Stagecoach on the Proposed Development, but no response was received. Since submission, contact has also been made on the 25th August and 3rd September 2020, but no response has been received. The Applicant is keen to continue engagement with First Group, and a further meeting has been scheduled on 8th October 2020. The Applicant is also keen to engage Stagecoach and has been actively requesting meetings on this basis.</p>	
TT1.1.6.20		<p>150 construction worker cars are assumed during the peak of construction [APP137]. The dDCO [APP-019] allows for parking facilities for up to 150 vehicles in Work No 3. Please</p>		<p>In response to question OW1.12.16 a Technical Note and Drawing 'AQ-ITT-LAY101', which details the proposed construction worker parking and surface water drainage strategy, has been produced (Appendix 6 of</p>	<p>The updated outline CEMP has been reviewed, but it is noted that the appendices have not been included. HCC require the appendices and associated parking plan to be provided to</p>

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		<p>provide details (in written and diagram form) of the location, design parameters and scheduling of the parking provision for these vehicles and demonstrate that the car park would include capacity sufficient for the vehicles of the cable gangs, transfer vehicles and general visitors to the site. How would fly parking on and adjacent to the local highway network be prevented?</p>		<p>the updated Onshore Outline Construction Environmental Management Plan (APP-505 Rev002)). This has capacity for 227 construction vehicles. This accounts for all construction works associated with the Converter Station and Cable route, plus LGVs and HGVs associated with construction of the cable route. Fly parking by construction workers will be prevented by all construction workers needing to sign-in at the start of the working day and sign-out and the end of the working day at the Converter Station Area compound, while the staff communication strategy will also provide details of permitted driver behaviours, HGV routing and parking. This is detailed within Section</p>	<p>review the construction parking provision.</p>

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				4.4 of the updated Framework Construction Traffic Management Plan (APP-450 Rev002).	
TT1.1.6.22	The Applicant	<p>The traffic assessment relies on a worst-case maximum of six, simultaneous, 100m sections of cable installation (ES 22.4.7.3 [APP-137]). What is the basis for this assumption, and how and where is this controlled in the dDCO [APP-019]?</p>		<p>The worst-case maximum of six, simultaneous, 100 m sections of cable installation is controlled via paragraph 2.3.1.7 of the updated Framework Traffic Management Strategy (FTMS) (APP-449 Rev002).</p> <p>A maximum of six working gangs are permitted to be constructing the Onshore Cable Route on the highway at any one time. This number was chosen in order to facilitate timely construction of the Onshore Cable Route whilst limiting the cumulative impacts of works on the operation of the highway network to an acceptable level by limiting the instances of</p>	<p>The Framework Traffic Management Strategy sets out the principles to which the works should be carried out with the details to be secured with full traffic management plans for each phase. It is suggested by HCC, as Highway Authority that there is a legal requirement set to ensure the number of works areas along the corridor are restricted to no more than 6, to ensure the impacts of construction do not exceed those modelled. This requirement should therefore be included within the DCO.</p>

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				traffic management locations being required.	
TT1.1 6.27	The Applicant	Can the Applicant explain what measures the chosen contractor would be expected to put in place to ensure road access for residents, businesses and emergency services is maintained during the construction of the Proposed Development? How are these expectations secured through the dDCO [APP-019]?		Full details of the strategy to maintain access to properties is included within the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included within Appendix 1 of the updated Framework Traffic Management Strategy (APP-449 Rev002), compliance with which is secured by Requirement 17 of the dDCO (APP-019).	The Applicant's response to this question notes that new information has been provided within Appendix A of the Framework Traffic Management Strategy. However, this information is not currently within the document. This will need to be provided to ensure that access can be maintained to private properties throughout the duration of the works.
TT1.1 6.31	The Applicant	Could the Applicant please identify where the assessment of intra-project cumulative effects of construction works at (up to) six simultaneous sites is	The Highway Authority agree that this has not been thoroughly assessed and have made recommendations within the LIR response for this to be considered further. This includes recommending	An assessment of the cumulative effects of construction works at six simultaneous sites is provided in the following documents and informed by use of the Sub Regional Transport Model,	Within the Transport Assessment Addendum, the Applicant has undertaken a bus journey time assessment to understand the impact

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		<p>addressed (in terms of matters such as driver delay, public transport disruption, pedestrian and cyclist amenity, etc on a longer journey that would encounter multiple construction sites).</p> <p>What additional mitigation has been considered, discounted or employed to deal with any cumulative effects such as these?</p>	<p>engagement with the bus operators and HCC's Passenger Transport Team, along with securing of appropriate mitigation measures to protect the delivery of public transport services and pedestrian and cyclist infrastructure.</p>	<p>which takes account of traffic re-assigning onto alternative routes as a result of the construction works:</p> <ul style="list-style-type: none"> • An assessment journey time increases on 8 corridors in the study area is provided in Section 1.11.7 of the Transport Assessment (TA) (APP-448). • An assessment of junction operation and delay at 31 key junctions is provided in Section 1.12 of the TA; and • An assessment of walking and cycling for each section of the Onshore Cable Corridor is included in Section 1.13 of the TA noting that in the vast majority of cases, pedestrian and cycle routes will be maintained in some form 	<p>of local bus services during the construction period. The assessment indicates that certain services will experience significant disruption during construction, predominantly services D2 and 39. These delays are likely to reduce the level of patronage these services receive. Suitable mitigation should therefore be provided to ensure the longevity of these routes during the construction period.</p>

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				<p>during construction works.</p> <ul style="list-style-type: none"> An assessment impacts to bus journey times across the study area is provided in Section 5 of the Supplementary Transport Assessment (document reference 7.8.1.11) and within Section 15 of the ES Addendum (document reference 7.8.1). Due to the length of the Onshore Cable Corridor and programme restrictions set-out in the Updated Framework Traffic Management Strategy (FTMS) (APP-449 Rev002) general traffic routes not being fixed within the study area , it is considered very unlikely that traffic would be subject to the cumulative delays associated with passing through the six construction sites and 	

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				<p>therefore this has not been assessed. For example, traffic traveling between Denmead and Eastney would most likely use the B2150 Hambledon Road, Hulbert Road, A3(M), A27, A2030 Eastern Road, A288 Milton Road, Bransbury Road, Henderson Road and Fort Cumberland Road during which they would only travel through a maximum of three traffic management locations. In reality additional, vehicles would re-route away to avoid the construction works if faced with multiple locations as part of one trip, as has been fully assessed within the TA and Chapter 22 of the ES (APP-138). It is also considered very unlikely that pedestrians or cyclists would be subject to the cumulative effects</p>	

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				<p>of routing through each of the six construction sites, due to the way in which the programme constraints prohibit multiple work locations in the same area. In all cases, as set out in Section 2.9 of the updated Framework Traffic Management Strategy (FTMS) (APP-449 Rev002)), pedestrian and cycle routes will also be maintained wherever possible with full closure of routes considered as a last resort. Therefore. it would be unlikely that construction works would lead to a cumulative effect beyond that already assessed within the Chapter 22 of the ES for individual links. As the cumulative effects of the work have been fully considered no further mitigation is proposed beyond that already set-</p>	

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				out in the updated FTMS (APP-449 Rev002), updated Construction Traffic Management Plan (APP-450 Rev002) and Onshore Outline Construction Environmental Management Plan (APP-505 Rev002)	